CAMMENGA AND ASSOCIATES, LLC.

100 Aniline Avenue Holland, MI 49424 Ph. (616) 392-7999 Fax (616) 392-9432

September 28, 2009

Mr. Kevin Null
Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road
Lisle, IL 60532-4352

Dear Kevin:

Confirming our phone conversation of September 25, 2009, the following clarifications/additions are requested.

The NRC has approved the addition of Mr. James Karchon and his company, Amyntas, as a business partner.

Additionally. Mike Pastoor, former Radiation Safety Officer (RSO) had submitted a Notice Of Significant Change dated August 12, 2009 (See attached Enclosure I) requesting, among other things, that the company name be changed from Cammenga & Associates, Inc. to Cammenga & Associates, LLC. Additionally, Ms. Judy Emery was requested to be designated as an Authorized User and Ms. Debbi Spykerman be designated as assistant Radiation Safety Officer. Supporting documentation for both parties was detailed in Enclosure I.

Enclosure 2 formally requests that Ms. Debbi Spykerman be elevated to Radiation Safety Officer (RSO) from assistant Radiation Safety Officer as Mr. Pastoor has left the company.

Prior to Cammenga & Associates, LLC's new business partner coming on board, an assessment of the company's strengths and weaknesses was undertaken. This survey, while acknowledging superior overall NRC regulatory controls, noted that a deficiency might exist, i.e., that sufficient back-up for the incumbent Radiation Safety Officer (RSO) was not in place.

Immediately, Ms. Spykerman prepared for and took the RSO test, scoring 95% as administered by Mr. Pastoor. Ms. Spykerman, while not possessing a college degree, has worked extensively following all prescribed NRC rules and regulations in the handling and safeguarding of all NRC materials. During Mr. Pastoor's past illness, vacations, etc., and during his recent decision to leave the company. Ms. Spykerman has assumed all of his responsibilities to ensure continued compliance with the NRC.

Ms. Spykerman has worked for the company for fourteen (14) years, during the majority of that time, testing and handling the sealed source (H-3) vials. She worked as an assembler for over four (4) years. She was then promoted to Supervisor where her primary responsibilities included scheduling and coordinating all clean room activities as well as testing and compliance of government and commercial compasses. In May 2002, Ms. Spykerman was designated as an Authorized User under the direct supervision of Cammenga's RSO. She has held that position for approximately seven (7) years. During this time, she has administered diffusion testing, urinalysis testing, conducted surveys and assumed responsibility for all governmental testing of vials and compasses, maintained control of all records for inventory and disbursement of vials to employees, and supervised the recycling process, etc. In 2006, she was promoted to Production Manager, overseeing all departments in the manufacturing process.

In summary, Cammenga & Associates, LLC believes that Ms. Spykerman has the character, knowledge, and commitment to the requisites outlined in Appendix G of the Radiation Safety Officer's duties and responsibilities.

We, therefore, respectfully request your approval to elevate Ms. Spykerman to RSO. As a footnote, we are training other personnel to become a backup to the Authorized User and RSO.

Respectfully,

CAMMENGA & ASSOCIATES, LLC

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Michael D. Alexander

Owner

ENCLOSURE 1

CAMMENGA AND ASSOCIATES, LLC.

100 ANILINE AVE. N., SUITE 258 HOLLAND, MI 49424 H 616-392-7999 F 616-392-9432

Notice of Significant Changes

12 AUGUST 2009

- 1. CAMMENGA seeks approval of Judy Emery as an Authorized User. Judy started with CAMMENGA in 1997 as an assembler; and within a short period became known as a trusted and safety minded employee. As of 2006, Judy, under the direct supervision of Michael Pastoor (Radiation Safety Officer) and Deborah Spykerman (Authorized User), started to assist with radiation surveys, checking sealed source inventory in and out, as well as use of radiation detection equipment. To date, Judy has received required training as well as completed a comprehensive examination, which she scored 100%. Even as an Authorized User, Judy will continue to be directly supervised by Mike or Deborah.
- 2. CAMMENGA seeks to designate Deborah Spykerman (Debbi), currently an Authorized User, as the assistant Radiation Safety Officer. Debbi started employment as an assembler in October 1995. In 2000 she started assisting the radiation safety officer with surveys while training to become a Radiation Test Technician. In 2002 Debbi was added to our license as a Radiation Test Technician/Authorized User. She continues to display a proactive approach to safety in radioactive related issues as well as other industrial safety issues.

Cognizant of the corporate intent of her to assist with RSO duties, she has undergone formal direct training as well as countless hours of informal discussion, review and observation of RSO duties and responsibilities. Debbi recently passed the comprehensive examination given to other RSO's with a score of 95%.

Debbi has authority to stop operations that she considers unsafe. She also has the commitment of management to fulfill duties and responsibilities to ensure that radioactive materials are processed and used in a safe manner.

ENCLOSURE 1

Her responsibilities will include:

Stopping unsafe activities, maintaining records, supervising decontamination, ensuring security, supervising or performing surveys, controlling disposal, and investigating abnormal events.

Debbi has received specific training within the scope of our NRC activities; such as Radiation Protection Principles, Characteristics of Ionizing Radiation, Units of Radiation Dose and Quantities, Radiation Detection Instrumentation, Biological Hazards of Exposure to Radiation related to Tritium Sealed Sources, US NRC Regulatory Requirements and Standards, and Hands-on Use of Radioactive Materials.

Debbi will also continue training on: the annual audit program, interaction with the NRC, and the calculating of uptake, contamination, airflow, etc. This request to designate Debbi as Assistant RSO is simply made as a precautionary measure, as to be prepared if something should happen to the current RSO, Mike Pastoor. Upon the writing of this amendment request, we do not anticipate any changes with day-to-day functions and responsibilities.

3. Please change the Licensee name from 'Cammenga and Associates, Inc.' to 'Cammenga and Associates, LLC.' The address, personnel, facility, layout, etc. will remain unchanged.

ENCLOSURE 2

CAMMENGA AND ASSOCIATES, LLC.

100 ANILINE AVE. N., SUITE 258 HOLLAND, MI 49424 H 616-392-7999 F 616-392-9432

Notice of Significant Changes

September 28, 2009

Cammenga & Associates requests the following:

- 1. Radiation Safety Officer (RSO) Mike Pastoor be removed from the license. He has left the company.
- 2. Ms. Debbi Spykerman, former assistant Radiation Safety Officer be formally added to our license and officially designated as the company's Radiation Safety Officer (RSO).